May 7, 2012

Stephen Posnack
Director, Federal Policy Division
Office of Policy and Planning
Office of the National Coordinator for Health Information
Attention: EHR Standards and Certification Proposed Rule
Hubert H. Humphrey Bldg., Suite 729D
200 Independence Ave., SW
Washington, DC 20201

> **Re: 45 CFR Part 170; RIN 0991-AB82: Health Information Technology Standards, Implementation, and Certification Criteria for Electronic Health Record Technology, 2014 Edition; Revisions to the Permanent Certification Program for Health Information Technology**

Dear Mr. Posnack:

On behalf of the membership of the Pharmacy e-Health Information Technology Collaborative (Collaborative), we are pleased respond to the Health Information Technology: Standards, Implementation Specifications, and Certification for Electronic Health Record Technology, 2014 Edition; Revisions to the Permanent Certification Program for Health Information Technology Notice of Proposed Rulemaking published in the *Federal Register* on March 7, 2012.

The Collaborative submits its comments in the attached document. The Collaborative is supportive of the proposed revisions to the permanent Certification Program for Health Information Technology as it applies to the objectives of the EHR Incentive Program in Meaningful Use—Stage 2; however, we are concerned that some of the proposed measures will become unfunded mandates (these areas are noted throughout our attached comments). Pharmacists are ineligible for EHR incentives, though they will need to exchange information with EHR systems to connect to and ensure needed bidirectional communication with EPs. As implementation of Stage 2 moves forward; especially with regard to the certification criteria for EHR technology, it should not create additional or financial burdens on pharmacists, such as becoming an unfunded mandate.
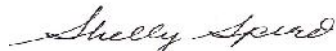
Formed in the fall of 2010, the Collaborative's focus is to assure the meaningful use (MU) of standardized electronic health records (EHR) that supports safe, efficient, and effective medication use, continuity of care, and provide access to the patient-care services of pharmacists with other members of the interdisciplinary patient care team.

The Collaborative seeks to ensure that pharmacist-provided patient care services are integrated into the National HIT interoperable framework. The Collaborative's founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education accreditation. The Collaborative's Associate Members represent e-prescribing networks, a standards development organization, transaction processing networks, pharmacy companies, system vendors and other organizations that support pharmacists' services. The Collaborative was founded by nine pharmacy professional associations representing over 250,000 members and includes six associate members from other pharmacy related organizations. For additional information, visit www.pharmacyhit.org

*****

On behalf of the Pharmacy e-HIT Collaborative, thank you again for the opportunity to comment on the *Health Information Technology Standards Implementation, and Certification Criteria for Electronic Health Record Technology, 2014 Edition; Revisions to the Permanent Certification Program for Health Information Technology* proposed rule. For more information, contact Shelly Spiro, Director, Pharmacy e-HIT Collaborative at shelly@pharmacyhit.org.

Respectfully submitted,

Shelly Spiro

Shelly Spiro
Director, Collaborative

Shelly Spiro, RPh
Director
Pharmacy e-Health Information Technology
Collaborative
shelly@pharmacyhit.org

Mark N. Brueckl, RPh, MBA
Assistant Director, Pharmacy Affairs
Academy of Managed Care Pharmacy
mbrueckl@amcp.org

Mike Rouse B.Pharm (Hons); MPS
Assistant Executive Director, Professional
Affairs and Director, International Services
Accreditation Council for Pharmacy
Education (ACPE)
mrouse@acpe-accredit.org

William Lang, MPH
VP Policy and Advocacy
American Association of Colleges of
Pharmacy wlang@aacp.org

C. Edwin Webb, Pharm.D., MPH
Associate Executive Director
Director, Government and Professional
Affairs
American College of Clinical Pharmacy
ewebb@accp.com

Marcie Bough, PharmD
Senior Director, Government Affairs
American Pharmacists Association
mbough@aphanet.org

Lynne Batshon
Director, Government Affairs
American Society of Consultant Pharmacists
Lbatshon@ascp.com

Christopher J. Topoleski
Director, Federal Regulatory Affairs
American Society of Health-System
Pharmacists
ctopoleski@ashp.org

Marc J. Ricker
CMO
IQware Solutions
mricker@iqwaresolutions.com

Kim Swiger, RPh
Vice President, Pharmacy Services
Mirixa Corporation
kswiger@mirixa.com

Rebecca Snead
Executive Vice President and CEO
National Alliance of State Pharmacy
Associations
rsnead@naspa.us

Ronna B. Hauser, PharmD
VP Policy and Regulatory Affairs
National Community Pharmacists
Association (NCPA)
ronna.hauser@ncpanet.org

Lynne Gilbertson
VP Standards Development
National Council for Prescription Drug
Programs (NCPDP)
lgilbertson@ncpdp.org

Stephen Mullenix. RPh
Sr VP, Communications & Industry Relations
National Council for Prescription Drug
Programs (NCPDP)
smullenix@ncpdp.org

Roger Pinsonneault, R.Ph.
Sr. Director, Business Development
RelayHealth – Pharmacy
Roger.Pinsonneault@RelayHealth.com

Holly Golden
Sr. Director, Business Development
RelayHealth – Pharmacy
Holly.Golden@RelayHealth.com

Michael E. Coughlin
President, CEO and CFO
ScriptPro
mike@scriptpro.com

Ken Whittemore, Jr., RPh, MBA
Senior VP, Professional & Regulatory Affairs
Surescripts
ken.whittemore@surescripts.com